

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

_____)	
SCANSOFT, INC.,)	
)	
Plaintiff,)	
)	
v.)	C.A. No. 04-10353-PBS
)	
VOICE SIGNAL TECHNOLOGIES, INC.,)	
LAURENCE S. GILICK, ROBERT S.)	
ROTH, JONATHAN P. YAMRON, and)	
MANFRED G. GRABHERR,)	
)	
Defendants.)	
_____)	

**SECOND DECLARATION OF DANIEL M. FORMAN
IN OPPOSITION TO MOTION TO DISQUALIFY
GOODWIN PROCTER LLP**

I, Daniel F. Forman, hereby state as follows:

1. I am an associate at the law firm of Goodwin Procter LLP and am counsel of record for the Plaintiff, ScanSoft, Inc., in the above captioned case.
2. I have reviewed VST's Reply Memorandum in Support of its Motion to Disqualify Goodwin Procter and the Second Declaration of Daniel Roth, in which VST suggests that its market share, expected volumes and damages exposures are confidential information. I submit this declaration to provide the court with publicly available information that bears on these issues.
3. Attached hereto as Exhibit A is a true and accurate copy of an interview of Richard Geruson, Chief Executive Officer of VoiceSignal Technology ("VST"), dated February 15, 2005, which I obtained from the internet version of Speech Technology Magazine. Exhibit A

quotes VST's CEO, Rich Geruson, as describing VST's 2004 volume as more than 20 million units and as forecasting 400% growth for software royalty revenue for 2005.

4. Attached hereto as Exhibit B is a true and accurate copy of a interview of Richard Geruson, Chief Executive Officer of VST, by Richard Bloor that appeared on www.symbianone.com on December 6, 2004. Exhibit B quotes Mr. Geruson as discribing the same sales figures as in the Speech Technology interview (Exhibit A).

5. Attached hereto as Exhibit C is a true and accurate copy of a Dun & Bradstreet report on VST, which estimates VST annual sales as \$4.4 million.

6. Attached hereto as Exhibit D is a true and accurate copy of information I retrieved from Google and which Google represents to be information from VST's web site saved by Google on December 7, 2005. Exhibit D shows that VST publicly disclosed on its web site that its estimated market share is approximately 90%.

I declare under penalty of perjury that the foregoing is true and correct. Executed on this 9th day of December, 2005.

/s/ Daniel M. Forman
Daniel F. Forman

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